

Policy and Procedures – WIOA Implementation

The following summarizes the activities of policy development as the result of the WIOA changes to the Rehabilitation Act of 1973 as amended:

1. Policy Review and Development of New Policy:
 - a. The Bureau Management Team (BMT), (comprised of the regional Resource Managers, Sandy Ostendorf, Kenda Jochimsen, and Charlie Levine), reviewed the policy from the previous manuals and identified those policies that could continue forward under WIOA and which policies were no longer applicable. The BMT desired to write the rules so they clearly aligned with the regulations and ensured that the policy was drafted in such a way so that “policy opinions” were removed, and instead replaced with very clear regulatory language.
 - b. In addition, the new policy was drafted in order for IVRS to be in compliance with regulatory requirements as it pertained to: Section 511, Transition and Pre-Employment Transition Services, One-Stop Centers, and Supported Employment Services. IVRS retained much of the policy on higher education training, but also included some of the key provisions required under WIOA that required IVRS to demonstrate that “State and Federal grants were accessed prior to paying in whole or in part for training at institutions of higher education”.
 - c. Policy was also drafted in a manner that left more decision-making to the counselor and the job candidate, removing overly restrictive policies from prior manuals.
 - d. As a result of the review of the prior manuals, the BMT reduced the number of policies considerably achieving the consolidation into one manual. The manual that was created was placed on the internet/intranet and allows for hyperlinks so staff are able to easily navigate to forms, definitions, and other applicable policy sections. This was all completed by the end of December, 2016.
2. Administrative Rules Revision and the SRC:
 - a. Prior to confirmation of the policy changes the Administrative Rules were revised. IVRS remained very consistent with the regulations allowing for little interpretation and instead clear connection to the Federal requirements.
 - b. The SRC throughout the two years since legislation was enacted had received information from IVRS on what The Agency considered appropriate for policy. Through those discussions further policy was drafted to be consistent with those conversations. An example of this was the discussion on the Job Retention policy. The SRC recommended that IVRS defer on developing and implementing any policy related to that until further clarification was received from RSA on how this would be implemented. Upon receiving information from RSA, the SRC was advised and they agreed that IVRS should proceed with the development of the policy. As a result the policy was written exactly as presented in the regulations.
 - c. The Administrative Rules were published for public comment and no comment was received. The Bureau Chief and legal counsel answered questions from the State Board of Education, which agreed to the policy and administrative rules as written upon understanding of key provisions. The SRC was provided a summary of the policies and there was one dissenting opinion regarding the section 511 policy by Page Eastin of CAP.

IVRS decided to proceed with our policy as it was written because it met the spirit of WIOA, which was to minimize duplication; and RSA had voiced in Chicago that they thought it was a good process to use.

3. RSA Conference on Regulations:

- a. In October Brandy McOmber and Kenda Jochimsen attended a conference in Chicago where RSA answered many questions and allowed IVRS to obtain clarification. IVRS learned at that meeting that IVRS was a little ahead of some of the other States in getting policy drafted, where some of the other States had not even started. It was also clear that further development on a policy regarding performance measures was needed, and that draft on the policy was actually completed 3/3/17 and will be presented to the SRC the week of 3/13/17 for review.

4. Supervisory Training on Policy:

- a. Supervisors were provided an initial training on policy prior to the full staff training. They also were invited to assist in training the field staff because they had wonderful questions and understanding of the policy developed. This training was completed in September so that the entire RSB could be trained in October, 2016.

5. Policy Training:

- a. During the month of October all field staff were trained on the new policy. Page Eastin, CAP Director, participated in the training held in Des Moines. Follow-up conversations were reinforced during staff meetings with supervisors, and clarifications continue as of the writing of this document as individual situations arise.